

Appendix 1 - Analysis of Scoping Report Comments

Environmental Report

Renewables & Low Carbon Energy Supplementary Guidance

July 2017

Consultee	Comments	Notes/PKC Response
GENERAL AND OTHER COMMENTS		
Historic Environment Scotland (HSE)	<p><u>Scope and Level of Detail</u></p> <p>It is my understanding that Perth and Kinross Council's Supplementary Guidance: Renewable and Low Carbon Energy (the SG) [will] provide further detailed information on the application of policy ER1: Renewable and Low Carbon Energy Generation of the 2014 Adopted Perth and Kinross LDP. I note that the historic environment has been scoped into the assessment. On the basis of the information provided, and subject to the comments provided in the attached annex, I am content with this approach and satisfied with the scope and level of detail proposed for the assessment.</p>	Comments noted and welcomed
Scottish Environment Protection Agency (SEPA)	<p><u>Scope and Level of Detail</u></p> <p>Generally, we are satisfied that the scoping report for the Perth and Kinross Council (PKC) – Renewable and Low Carbon Energy Supplementary Guidance (SG) provides sufficient information on the proposed scope and level of detail for the assessment. We do however [have] some issues to raise and would welcome further discussion, which could involve a meeting, after the end of the scoping consultation.</p> <p>The Scottish Government SEA Guidance provides guidance to Responsible Authorities about the type of information that is expected to be provided at each SEA Stage; we have also produced Standing Advice for Responsible Authorities on Strategic Environmental Assessment (SEA) Scoping Consultations. We have used the guidance to inform our detailed scoping response which is attached as Annex 1.</p> <p><u>Purpose and Scope</u></p> <p>The scoping report states (paragraph 2.5) 'while the SG is unlikely to set new policy it may be necessary to update Policy ER1 depending on the outcome of both the environmental assessment and supplementary guidance development processes. If this is the case the updated policy will be incorporated into the upcoming review of the Local Development Plan.' We welcome this and assume that the SG development process would involve considering the outcome of the Main Issues Report (MIR) for the PKC LDP2 consultation. The outcome of this SG consultation could influence the re-wording of the policy but other comments arising from the LDP consultation can influence the preparation of the SG. Please note that we have provided review comments on the Adopted LDP policies as part of our response of the 12 October 2015 (email to Development Plans Team Leader).</p> <p><u>Outcomes of the Scoping Exercise</u></p> <p>We would find it helpful if the Environmental Report included a summary of the scoping outcomes and how comments from the Consultation Authorities were taken into account.</p> <p>We welcome proposals for the inclusion of a summary of how the comments provided by the Consultation Authorities at the Scoping stage have been taken into account in the preparation of the Environmental Report.</p>	<p>Comments noted and welcomed. A meeting to further discuss the comments made by the Consultation Authorities on the Scoping Report took place in April 2016 following an internal analysis of those comments and the production of a draft PKC response.</p> <p>Comments noted and welcomed. Agree that the development of LDP2 and comments made as part of the MIR consultation process may also be relevant to the development of the SG and have been given due consideration.</p> <p>Comments noted and welcomed. This analysis 'Analysis of Scoping Report Comments' table has been included as an appendix to the ER.</p>
Scottish Natural Heritage (SNH)	<p><u>Scope of the assessment and level of detail</u></p> <p>We understand that the Supplementary Guidance (SG) will support delivery of a range of renewable technologies (including wind, wood, solar and tidal), guide development to appropriate locations through a spatial framework and provide advice on issues that require to be taken into account when assessing specific proposals.</p> <p>Overall we are content with the scope and level of assessment proposed, and supportive of the ecosystems services assessment approach proposed, but recognise that this type of assessment is in exploratory stages. As such we have some queries about some elements of the assessment method which are still uncertain. As discussed, we would appreciate your review of our consultation comments at scoping to ensure that significant environmental effects can be satisfactorily assessed. We would be pleased to discuss these further prior to the commencement of the assessment.</p> <p><u>Habitats Regulations Appraisal (HRA)</u></p> <p>There is no mention of whether a Habitats Regulations Appraisal (HRA) of the SG will be carried out. Advice on deciding whether the SG should be subject to a Habitats Regulations can be found at: http://www.snh.gov.uk/docs/A1500925.pdf. Please let us know if you need any help with the HRA.</p>	<p>Comments noted.</p> <p>Comments noted and welcomed. A meeting took place with the Consultation Authorities in April 2017 to further discuss the SEA methodology.</p> <p>Comments noted and welcomed. PKC will prepare a HRA of the SG during summer 2017.</p>
SECTION 1: INTRODUCTION		
SECTION 2: PLAN CONTEXT		
SECTION 3: ENVIRONMENTAL BASELINE AND ISSUES		
Scottish Environment Protection Agency (SEPA)	<p><u>Section 1: Key Facts and Section 2: Background to the Supplementary Guidance</u></p> <p>We understand that as an action from the Perth and Kinross LDP PKC has to produce supplementary guidance to expand on how proposals for development can comply with the LDP and in particular Policy ER1. This guidance will replace the existing one for wind energy development issued in 2005.</p> <p>We would however comment that the Proposed PPS objectives...cover less types of energy development than the end note to the policy ER1 which the SG relates to (policy wording page 10). There is only reference to wind, wood, tidal and solar, when in fact ER1B mentions: small-scale wind energy developments and single turbines, hydro-schemes, woody biomass, landfill gas, energy from waste, anaerobic digestion, energy storage, large photovoltaic arrays, and micro-generation.</p> <p><u>Section 2: Purpose and Scope and Section 3, Paragraph 3.14: Key Baseline Facts for Perth and Kinross</u></p> <p>We note the intention to undertake an ecosystem services approach. We would request that in presenting the findings:</p> <ol style="list-style-type: none"> It is demonstrated how the requirements of the SEA legislation have been met, in particular, the requirements of Schedule 3 of the Act; and that The Environmental report is a separate and easily identified component of the wider assessment. <p>Please note that when consulted we will only comment on the environmental components of the assessment in accordance with our statutory SEA responsibilities and competencies.</p> <p>In relation to point b) above, we note that in paragraph 3.14 it is stated 'the groupings in Table 3.1 below are note arranged as per the list of issues under Schedule</p>	<p>Comments noted. PKC will cover all renewable energy technologies included at the end of Policy ER1. Any changes to the existing Policy (ER1) will be highlighted as part of the LDP review, and will be reflected accordingly in the SG, where appropriate to do so.</p> <p>Comments noted and welcomed. PKC fully intends to fulfil the requirements of the SEA Act (2005). It is most likely that in terms of reporting format that the outcomes of the various parts of the assessment will be appended to the ER, and as such the ER will be a separate and easily identified component of the wider assessment.</p>

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	<p>3, Section 6(a) of the Environmental Assessment (Scotland) Act 2005, instead they have been structured under their relevant ecosystem service i.e. Regulating, Provisioning and Cultural. However, it should be noted that each of the environmental issues have been addressed.' We are content with this approach.</p>	
	<p><u>Section 3: Baseline Data and Relevant Aspects of the Current State of the Environment</u> SEPA holds significant amounts of environmental data which may be of interest to you in preparing the environmental baseline, identifying environmental problems, and summarising the likely changes to the environment in the absence of the PPS, all of which are required for the assessment. Many of these data are now readily available on SEPA's website. Additional local information may also be available from our Access to Information unit at our Corporate Office (Telephone 01786 457700 or email dataenquiries@sepa.org.uk). Other sources of data for issues that fall within SEPA's remit are referenced in our Standing Advice for Responsible Authorities on Strategic Environmental Assessment (SEA) Scoping Consultations. And the SEA topics guidance in http://www.sepa.org.uk/environment/land/planning/strategic-environmental-assessment/</p>	<p>Comments noted and welcomed. Reference made to SEPAs 'Standing Advice' and other guidance to identify if there is any additional environmental data of relevance to our SEA.</p>
<p>Historic Environment Scotland (HSE)</p>	<p><u>Section 3, Table 3.1: Ecosystem Services, Associated Key Facts and Relevance of Indicators</u> The baseline for the historic environment should also include Inventory Battlefields (of which there are 4 in Perth and Kinross: Battle of Duplin Moor, Battle of Dunkeld, Battle of Killiecrankie and Battle of Tippermuir), and undesignated heritage assets (including those on Perth and Kinross' sites and monuments record).</p>	<p>Comments welcomed and noted. Accidental omission of details of Inventory Battlefields and unscheduled archaeology in Table 3.1. These Inventory sites and unscheduled archaeology have been identified on the 'Historic Environment – Cultural Services 2015' map in Appendix B of the Scoping Report, Section B2.2 and will be included in the assessment, including reference in Table 3.1 of the Environmental Report.</p>
<p>Scottish Environment Protection Agency (SEPA)</p>	<p><u>Section 3, Table 3.2: SEA Topic and Associated Environmental Issues and Considerations</u> Water It is noted that no mention is made, under the Water section, to the potential impacts on Ground Water Dependent Terrestrial Ecosystems (GWDTEs). These habitats are protected under the Water Framework Directive (WFD) and may be impacted upon by renewable energy development (e.g. windfarms, hydroschemes) through the excavation of soil and bedrock during construction of roads, access tracks, foundations, trenches and borrow pits. Indeed dewatering of below ground activities may cause localised disruption to groundwater flow. This can impact on GWDTEs and nearby abstractions. GWDTEs are mentioned in Appendix A as part of the Land Use Planning System SEPA Guidance Note 4 Planning guidance on onshore windfarm developments (May 2014) (page 69). We therefore recommend that GWDTEs are mentioned in Table 3.1 and considered as part of the assessment.</p>	<p>Comments noted and welcomed. Table 3.2 (Water) of the Environmental Report updated to identify the potential for disruption to wetlands, especially groundwater dependent terrestrial ecosystems (GWDTEs), as a result of renewable energy proposals and consider as part of the environmental assessment.</p>
	<p><u>Section 3, Table 3.2: SEA Topic and Associated Environmental Issues and Considerations</u> Air Although we welcome the reference to the Air Quality Management Areas (AQMAs), we consider that the information on Air focusses on carbon emissions only and do not sufficiently consider other pollutants which can arise from energy development. For example, in page 28 it is stated: 'Air quality could be affected by increased biomass for heat, but as it is at least in theory carbon neutral, and has the potential to displace fossil fuels, impacts should not be significant overall'. This statement seems to imply a 'trade-off' between issues. The effects arising in terms of particulate matter (PM) and other pollutants are different than the effects in terms of carbon emissions and should be assessed as part of the environmental assessment. An increase in biomass could have a detrimental impact on air quality and this should be minimised as it could have a detrimental impact on human health. These effects can be significant and should be mitigated separately. We do however note and agree that 'The redevelopment of existing power stations and projects with carbon capture and storage may impact on biodiversity, air and water'. Other projects, such as Energy from Waste (EfW), Anaerobic Digestion (AD), landfill gas, mentioned in policy ER1A may also have impacts on air quality. We therefore recommend looking at the documents available at the following links in order to prepare for the ER: http://www.iaqm.co.uk/text/guidance/epuk/biomass_guidance_scotland.pdf https://www.dundee.gov.uk/sites/default/files/publications/CD_AirQuality_TechnicalAnnex.pdf http://www.southlanarkshire.gov.uk/downloads/file/9343/sustainable_development_and_climate_change</p>	<p>Comments noted. Table 3.2 of the Environmental Report updated to identify the potential for impacts on air quality and human health and as a result of other pollutants, including particulate matter emissions, which could arise from specific energy developments.</p>
	<p><u>Section 3, Table 3.1 and 3.2</u> Soils In page 25 and 27 a threat to soil functionality which is missed is damage or loss of soil which acts as a carbon store. The reference in the key facts regarding soils and the subsequent indicators relating to carbon rich soils (page 32) should be expanded to include coverage of category X soils in the SNH mapping. This is mentioned in the Note (*) but is not clear in the indicator's description which only mentions Class 1 and 2 soils. Category X soils do not have vegetation which indicates peatland habitat, however these are all soils which are carbon rich and therefore should be protected as they are a carbon store.</p>	<p>Comments noted. Tables 3.1 and 3.2 in the Environmental Report updated accordingly to include this threat to soil functionality.</p>

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	<p><u>Section 3, Table 3.2: SEA Topic and Associated Environmental Issues and Considerations</u></p> <p>Material Assets</p> <p>We note that district heating is not discussed in report, even though paragraph 2.2 states that the SG ‘will support the delivery of a diverse range of electricity generation from renewable energy technologies, including the expansion of renewable energy generation capacity, and the development of heat networks’ and clear requirements are reported in the list of PPS in Appendix A (e.g. as part of NPF3, SPP and Tayplan). District heating is also mentioned in the draft MIR (para 3.6.6) for which SEPA has recently provided comments in our response of the 12 October 2015. District heating could lead to potential significant positive environmental effects in terms of the SEA topics of Population and Human Health as well as Material Assets and Climatic Factors.</p>	<p>Comments noted and welcomed.</p> <p>Table 3.2 in the Environmental Report updated to identify the potential for significant positive environmental effects on Population, Human Health, Material Assets and Climatic Factors as a result of district heating. Comments made by SEPA in response to the MIR consultation acknowledged as part of the ER.</p>
	<p><u>Section 3, Table 3.1: Environmental Services, Associated Key Facts and Relevance of Indicators, and paragraphs 3.16-3.17, page 29 Data Gaps and Problems</u></p> <p>Material Assets</p> <p>We note that lack of industrial waste and special waste data is listed in the data gaps in paragraph 3.17 of the scoping report. We also note however that no waste information is presented in the baseline while in fact waste data can be sourced from the waste data section of the SEPA’s website, which can also be accessed from the Scotland’s Environment website: http://www.environment.scotland.gov.uk/, or from the PKC. Information can also be sourced as part of other SEAs for the Perth and Kinross Area.</p> <p>We would welcome an update on this important aspect of the state of the environment (not only in terms of SEA but we believe also in terms of ecosystem services) as part of the ER. This may be particularly relevant for possible EfW plants proposals.</p> <p>Please note that forestry waste can arise as part of renewable energy development and we therefore consider important to consider this as part of the assessment. In particular, felling of trees as a result of wind farms and hydro-schemes developments can generate a significant amount of waste and may require an exemption from licensing under the Waste Management Licensing (Scotland) Regulations 2011.</p>	<p>Comments noted and welcomed.</p> <p>Information and data related to waste has been added to Table 3.1 of the Environmental report.</p>
	<p><u>Section 3, paragraph 3.18 Scoping of the Environmental Topics</u></p> <p>We agree that in this instance all environmental topics should be scoped into the assessment.</p>	<p>Comments noted and welcomed.</p>
<p>Scottish Natural Heritage (SNH)</p>	<p><u>Sections 1 and 2: Introduction and Plan Context</u></p> <p>We agree with the scope of the assessment as set out in Table 1.</p> <p><u>Section 3: Introduction</u></p> <p>We welcome the intent to include a description of the likely evolution of the environment without the plan to provide a frame of reference for the assessment of the plan.</p> <p><u>Section 3: Relevant PPS</u></p> <p>Relevant Plans, Programmes and Strategies (PPS) - Appendix A: We support the focusing on PPS which are particularly relevant to renewables and low carbon. The list of PPS is comprehensive and thorough.</p> <p><u>Section 3, paragraph 3.12: Baseline Data and Relevant Aspects of the Current State of the Environment</u></p> <p>We support making use of the SG land use data directory to help create a composite measure of ecosystems provision.</p> <p><u>Section 3, Table 3.2: SEA Topic and Associated Environmental Issues and Considerations</u></p> <p>Soils</p> <p>Add that renewable energy effects can also lead to impacts on carbon rich soils, particularly onshore wind energy.</p> <p>Climatic Factors</p> <p>Add potential transportation effects from biomass to the processing plant.</p> <p><u>Section 3, paragraphs 3.16-3.17: Environmental Baseline and Issues – Data Gaps</u></p> <p>The adopted LDP’s SEA Environmental Report (ER) referred to the lack of information on capacity of the landscape to accommodate development, and we recommend this is added.</p> <p><u>Section 3, paragraph 3.18 Scoping of the Environmental Topics</u></p> <p>We agree with the scoping in of SEA environmental topics.</p>	<p>Comments noted and welcomed.</p> <p>Comments noted and welcomed.</p> <p>Comments noted and welcomed.</p> <p>Comments noted and welcomed.</p> <p>Comments noted and welcomed.</p> <p>Comments noted and welcomed.</p> <p>Table 3.2 of Environmental Report updated accordingly.</p> <p>Comments noted and welcomed. PKC has undertaken and commissioned various studies which will be included as part of the assessment of environmental landscape impacts where appropriate, including cumulative impacts.</p> <p>Comments noted and welcomed.</p>
<p>West Coast Energy Limited</p>	<p><u>Introduction</u></p> <p>At paragraph 1.3 the Council suggests that it may need to update Policy ER1 from the newly adopted LDP depending on the outcomes of the Supplementary Guidance (SG). This is a difficult area under the new guidelines, since while it may be permissible for this SG to be directly linked into the LDP as a subsidiary part of the development plan, actual changes to policy in an adopted LDP are not a matter which would appear either practicable or desirable. The LDP has been the subject of much debate on the Examination into it about its scope and criteria (as has happened with renewable energy across Scotland) and therefore any suggestion that it may somehow be “subverted” into SG is a matter for concern. The reality is that there is no likelihood of the Council amending ER1 to a more positive stance towards renewable energy and so the inevitable conclusion has to be that any changes that might be made to ER1 “by the back door” are likely to be intended to tighten up the approach. Perth and Kinross Council’s approach towards the consenting of wind energy developments has to date been extremely negative, with the very recent decision to approve the four turbine scheme at the Binn Eco Park at Glenfarg against officer advice being a welcome diversion from the decisions taken over the last twelve years. The references that are made within the Scoping Report to the substantial increase in onshore wind consented and developed in the Council area over the last few years has come almost without exception from appeals being allowed and Section 36 schemes being</p>	<p>Comments noted.</p> <p>The Council has no intention of making changes to Policy ER1 “by the back door”, any proposed or suggested amendments to the Policy which come about as a result of undertaking the SEA and producing the SG will be put forward for inclusion within the review of Policy ER1 in the LDP; the first stage of the review of the Plan has already begun with the publication of the Main Issues Report. The timeframe for the production of both the SG and the LDP Proposed Plan are aligned, this should therefore allow for an updated ER1 to be included in the Proposed Plan for consultation and then the formal examination process for the new LDP if there are outstanding representations.</p> <p>The LDP Review process aside, the SG itself will follow the formal prescribed processes for producing, consulting and adopting statutory supplementary guidance as set out in the</p>

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	<p>consented after the Council objected. The Council suggestion that any changes to ER1 will be incorporated into a review of the LDP is noted but the whole Review process may take years given the 2014 date for the adoption of the LDP, and unless and until any changes have themselves been the subject of formal examination as part of the SG process it is difficult to see how such changes can be given the same weight as a properly tested LDP policy.</p>	<p>Planning etc. (Scotland) Act 2006, The Town and Country Planning (Development Planning) (Scotland) Regulations 2008 and Circular 6/2013 – Development Planning. Supplementary Guidance is not considered as part of the examination for a LDP. At the point at which the SG has been approved by the Scottish Ministers and adopted by the Council it will be a material consideration in the determination of applications for renewable energy developments. It is not accepted that the Council has had an extremely negative view on wind energy developments. What it has done is considered proposals in light of Development Plan policy and sought to ensure the right development in the right place and in most appeal decisions the Council’s decision has been upheld by reporters and Scottish Ministers.</p>
	<p><u>Relevant Plans, Programmes and Strategies, paragraph 3.7-3.10, NPF3 and SPP</u> Paragraph 3.7 is deficient in its summary of the objectives of the new Scottish Planning Policy 2015 (SPP) – which of course post-dated the adoption of the current LDP. There is no mention of the sustainability objectives set out in the first part of SPP, which are already being given reference[d] in appeal decisions by Reporters as a material consideration of some weight, or of the four key outcomes which are intended to support the SPP vision in paragraphs 13-23. Renewable energy, and especially wind energy, has been supported as being sustainable development as a matter of principle and this element of the SPP (paragraphs 24-29 in particular) needs to be reflected in this part of the Report.</p>	<p>Comments noted. Section 3 of the Scoping Report (paragraphs 3.3- 3.11) merely provides a short synopsis of the key relevant plans, programmes and strategies (PPS) which are considered to have a strong influence over the development of the SG. The consultee is referred to Appendix A of the Scoping Report which provides a full analysis of all PPS which are considered to be relevant to the development of the SG. The relevant content of SPP 2014 is covered in detail in Appendix A of the Scoping Report – see pages 56-58, 64-67, 70, 77, 78-79, 81-83, 88-90, and 92-93. The analysis in Appendix A covers the paragraphs of SPP listed by the consultee in their response to the Scoping Report.</p>
	<p><u>Section 3: Key Baseline Facts for Perth and Kinross, Table 3.1</u> Table 3.1 refers to “prime” agricultural land, but there needs to be a definition of what grades this is intended to refer to – is it just Grades 1 and 2 or does it include 3a?</p>	<p>Comments noted. As per paragraph 3.14 of the Scoping Report, Table 3.1 provides a text summary of the Environmental Baseline for the SG which is covered in Appendix B to the Scoping Report. The Land Capability for Agriculture map in Appendix B identifies Classes 1, 2 and 3.1 as prime agricultural land. It is recommended that the Scoping Report is read in its entirety to avoid any confusion.</p>
SECTION 4: SEA OBJECTIVES AND INDICATORS		
<p>Scottish Environment Protection Agency (SEPA)</p>	<p><u>Section 4, Table 3.4: SEA Objectives, Assessment Criteria and Relevant Indicators</u> We would recommend that the wording of the following SEA objective(s) and indicators in Table 3.4 be revised as follows.</p> <ul style="list-style-type: none"> ▪ SEA3 – We suggest adding as an indicator the number (or %) of applications that have enforcement action taken due to potential pollution. We are aware of the fact that PKC have issued stop notices for hydro schemes where they have not discharged planning conditions/ caused pollution and therefore we would recommend that the SG provides clear guidance to developers to ensure that there is less need for such action in the future. The Planning Enforcement Officer in PKC may be able to advise. ▪ SEA 4 - ‘Proportion of renewable energy development proposals which contain information regarding the reduction and management of waste generated as a result of the proposal/ development’. Please see our other comments in relation to waste. ▪ SEA 5 - We note the proposal of an indicator for natural flood management but wonder if this is more suited to SEA3 as SEA 5 deals with Conserving and enhancing the diversity of habitats and species. We would welcome further clarification on this indicator in general. ▪ SEA 7 – This could be expanded to include District Heating indicators. ▪ SEA 12 – This should consider other indicators in addition to CO₂ emissions in order to consider the impact on AQMAs. Please see out SEA topic guidance on Air at our website below and the guidance mentioned in point 3.6 above. http://www.sepa.org.uk/environment/land/planning/strategic-environmental-assessment/ http://www.iaqm.co.uk/text/guidance/epuk/biomass_guidance_scotland.pdf https://www.dundee.gov.uk/sites/default/files/publications/CD_AirQuality_TechnicalAnnex.pdf http://www.southlanarkshire.gov.uk/downloads/file/9343/sustainable_development_and_climate_change 	<p>Comments noted and welcomed. Table 4.1 of Environmental Report updated to reflect SEPA comments.</p>
<p>Scottish Natural Heritage (SNH)</p>	<p><u>Section 4, Paragraphs 4.1-4.2 and Table 3.4: SEA Objectives, Assessment Criteria and Relevant Indicators</u> We support the inclusion of more renewable and low carbon energy focused objectives and indicators which should enable a more focused assessment.</p> <ul style="list-style-type: none"> ▪ SEA 4: Amend objective to “Promote the important role and potential of forests and woodlands and avoid adverse impacts on their natural heritage value.” While the contribution of forests and woodlands to renewable energy production is recognised, the need to conserve the natural heritage value of woodlands and forests should also be included. The added avoidance wording is consistent with other SEA objectives here, and recognises the potential for significant environmental impacts from renewables on the woodland and forest resource. Recommend repeat woodland indicator in SEA 8. ▪ SEA 8: amend wild land indicator to “Areas (ha) of wild land (SNH wild land areas 2014) http://www.snh.gov.uk/docs/A1323225.pdf affected by renewable 	<p>Comments noted and welcomed. Table 4.1 of Environmental Report updated to incorporate SNH comments.</p>

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	<p>energy developments.”</p> <ul style="list-style-type: none"> SEA 10: We welcome the inclusion of the green infrastructure objective and indicators. 	
<p>West Coast Energy Limited</p>	<p><u>Section 4: Proposed SEA Objectives and Indicators</u></p> <p>On page 32, the report refers to the SEA Objectives, SEA criteria and relevant indicators. In our opinion one of the difficulties that this creates is that some of the topics almost seem diametrically opposed to the concept that the SG will actually deliver anything at all in the way of a major contribution to new renewable energy sources. The idea that the SG for Renewable Energy will of itself be a means of promoting the preservation and enhancement of the distinctive landscape of Perth and Kinross, or of promoting the conservation of the cultural heritage of the area seems little more than applying great weight to a series of objectives outwith the field of renewable energy which are already catered for in planning policy. There is often reference in appeal decisions that the idea that a wind farm could ever be said to preserve or enhance the landscape or the setting of heritage assets is nonsensical and yet this is generally the policy test that Councils seeks to apply. Given the approach adopted by Perth and Kinross Council over the last twelve years towards consenting onshore wind farms, this exercise borders on re-creating the same policy issues that were in the structure and local plans with the SPG. What these objectives do not seem to be able to do is to create the environment within which a balancing exercise can be carried out. SEA6 on page 33 poses the questions about renewables and the almost rhetorical response is that the SG will not be able to do any of these things unless the balancing exercise is right. The idea that a SG for Renewable Energy has as one of its key SEA objectives as the preservation or enhancement of the landscape with no reference at all within it to the way in which the balancing exercise is envisaged in SPP is to be carried out creates an inevitable tension within the document and no attempt to reconcile it has been explored.</p>	<p>Comments noted.</p> <p>The Environmental Assessment (Scotland) Act 2005 requires responsible authorities, which in the case of this SG is Perth & Kinross Council, to consider the likely significant effect of implementing their plan, programme or strategy (PPS), i.e. the Renewable and Low Carbon Energy Supplementary Guidance (SG) on the environment, including on issues such as:</p> <ul style="list-style-type: none"> Biodiversity Population Human health Fauna Flora Soil Water Air Climatic factors Material assets Cultural heritage, including architectural and archaeological heritage Landscape, and The inter-relationship between the issues referred to above <p>Responsible authorities are also required to consider the short, medium and long-term; permanent and temporary; positive and negative; and, secondary, cumulative and synergistic effects of implementing their PPS (Schedule 3). The SEA is concerned with likely significant impacts on the environment, rather than achieving a balance between development and the protection of the environment. It will be for the Council to consider the outcome of the SEA and achieve that balance through the development of the SG, taking account of any mitigation and enhancement measures proposed as part of the SEA process.</p>
<p>SECTION 5: PROPOSED ASSESSMENT METHODOLOGY</p>		
<p>Historic Environment Scotland (HES)</p>	<p><u>Section 5: Thematic or Objective Based Assessment, Figure 5.4: Assessment Classification</u></p> <p>HES advises caution with the application of the classification of significant positive and negative effects. The classification descriptions detailed are focused on quantitative spatial analysis (<i>‘effects are widespread across the catchment’</i>) which is unlikely to helpfully identify the nature and magnitude of direct effects on historic environment assets. It would appear to be difficult for this approach to identify indirect (setting) effects, as the setting of heritage assets will not form part of the spatial baseline; this is particularly relevant given the setting impacts are key considerations for renewable energy development. Additionally, the level of effects on designated historic environment assets should not be determined by the condition of the asset (<i>‘effects are likely to cause an adverse effect on an ecosystem service that is in less than good condition’</i>).</p> <p><u>Section 5, paragraphs 5.19-5.22: Scenario Testing</u></p> <p>HES welcome the intention to integrate the SEA and plan making process closely, and to use the SEA to influence the plan making process. However, given observations above about regarding the limitations of a quantitative, spatial approach, it will be important that the assessment process incorporates qualitative assessment of effects on the historic environment. It is noted that the scenario testing will involve weighting of different ecosystem services. Whilst this may be helpful to the development of the Supplementary Guidance, it will be important to ensure that the findings of the SEA are not subject to, or reported with, weightings.</p>	<p>Comments noted.</p> <p>Part of the purpose of the SG is to provide a spatial framework for wind energy proposals (above a certain scale) relative to the Perth and Kinross scale. The assessment of the impact of such developments on the environment at the strategic scale can only go so far without any detailed information on specific, individual development proposals, which are not available at this stage and this is acknowledged. Importantly, the section which provides guidance on the issues to be considered for each renewable technology will give due cognisance of any direct and indirect impacts on the historic environment, and what mitigation measures will be required, where this is appropriate.</p>
<p>Scottish Environment Protection Agency (SEPA)</p>	<p><u>Section 5, paragraphs 5.1-5.18: Thematic or Objective Based Assessment</u></p> <p>We welcome the proposed matrix assessment proposed in Figure 5.3 – Illustration of the summary table – We recommend including a commentary section within the matrices in order to state, where necessary, the reasons for the effects cited and the score given helps to fully explain the rationale behind the assessment results. This allows the Responsible Authority to be transparent and also allows the reader to understand the rationale behind the scores given.</p> <p>Where it is expected that other plans, programmes or strategies are better placed to undertake more detailed assessment of environmental effects this should be clearly set out in the Environmental Report.</p> <p>We would expect all aspects of the PPS which could have significant effects to be assessed.</p> <p>We support the use of SEA objectives as assessment tools as they allow a systematic, rigorous and consistent framework with which to assess environmental</p>	<p>Comments noted and welcomed.</p> <p>The significance of effects will be incorporated in to Section 6 of the Environmental Report, including identifying where other PPS are better placed to undertake more detailed assessment of environmental effects.</p> <p>Section 6 of the Environmental Report will include the assessment of potential significant effects, including consideration of necessary mitigation measures.</p>

Consultee	Comments	Notes/PKC Response												
	<p>effects.</p> <p>When it comes to setting out the results of the assessment in the Environmental Report please provide enough information to clearly justify the reasons for each of the assessments presented. It would also be helpful to set out assumptions that are made during the assessment and difficulties and limitations encountered.</p> <p>It is helpful if the assessment matrix directly links the assessment result with proposed mitigation measures such as in the example below:</p> <table border="1" data-bbox="433 422 1184 617"> <thead> <tr> <th>Issue/Impact Identified in ER</th> <th>Mitigation Measure</th> <th>Lead Authority</th> <th>Proposed Timescale</th> </tr> </thead> <tbody> <tr> <td>Insert effect recorded in ER</td> <td>Insert mitigation measure to address effect</td> <td>Insert as appropriate</td> <td>Insert as appropriate</td> </tr> <tr> <td>Etc.</td> <td>Etc.</td> <td>Etc.</td> <td>Etc.</td> </tr> </tbody> </table> <p>Please note that, although it is preferred to allocate either a negative or a positive scoring, there could be some unknown effects, this should be presented in the assessment too (usually shown with a '?' scoring).</p>	Issue/Impact Identified in ER	Mitigation Measure	Lead Authority	Proposed Timescale	Insert effect recorded in ER	Insert mitigation measure to address effect	Insert as appropriate	Insert as appropriate	Etc.	Etc.	Etc.	Etc.	
Issue/Impact Identified in ER	Mitigation Measure	Lead Authority	Proposed Timescale											
Insert effect recorded in ER	Insert mitigation measure to address effect	Insert as appropriate	Insert as appropriate											
Etc.	Etc.	Etc.	Etc.											
	<p><u>Section 5, paragraph 5.21: Scenario Testing</u></p> <p>We note that alternatives are still being considered. Any reasonable alternatives identified during the preparation of the plan should be assessed as part of the SEA process and the findings of the assessment should inform the choice of the preferred option. This should be documented in the ER.</p> <p>Par 5.21 states: <i>'The Guidance is currently in the early preparation stage and as such alternative objectives and policies have not yet been defined. Therefore, at this time it is proposed that the SEA will map a set of ecosystem services and delineate preferred areas according to different scenarios; from this process the preferred strategy will emerge. Each scenario will be produced by a set of weightings allocated to different services and corresponding with different landscape management strategies which decision-makers could undertake'</i>. We are content with this approach as soon as all the reasonable alternatives (scenarios) are going to be assessed as part of the SEA environmental assessment. This is in order to identify the effects of the SG on the environment per se and not just in relation to its benefits. The ecosystem approach considers the services that the environment provides to us whilst the SEA considers the effects that a plan (in this case the SG) has on the environment.</p>	<p>Comments noted and welcomed. Any reasonable alternatives identified through the environmental assessment process will be reported within the Environmental Report. Concerns regarding the SEA not considering the likely significant effects of the Plan on the environment whilst applying an ecosystem services approach are recognised but PKC will ensure that it fulfils the legislative requirements of the Environmental Assessment (Scotland) Act 2005 in terms of assessing the potential for significant environmental effects as a result of implementing the SG.</p>												
	<p><u>Section 5, paragraph 5.23, Synergistic Effects</u></p> <p>Synergistic effects in paragraph 5.23 states: <i>'An ecosystem services dependency diagram utilising network analysis and causal chains will be used to aid this assessment and to ensure that both synergistic and secondary effects are considered, where relevant trade-offs will be identified'</i>. It would have been helpful to provide an example of an ecosystem services dependency diagram at this scoping stage to clarify this point. In particular, we are unclear on the meaning of trade-off in the context of synergistic and secondary effects. Please consider the definitions provided in the SEA Guidance published by the Scottish Government in August 2013, page 33.</p> <p>In general, in relation to trade-offs, please note that a negative effects for one issue should not be traded-off by a positive effects on another issue, but negative effects should be mitigated separately. The sum of negative and positive effects can be considered to compare different options, but not to provide an overall effect within one option. Therefore one option with 4 negative and 6 positive effects does not result in overall two positive effects.</p>	<p>Comments noted.</p> <p>Please note that it is not intended to identify trade-offs within the assessment based purely on the sum/number of likely significant positive and negative effects within a catchment but rather a qualitative element will also be included within the assessment considering what those likely significant effects might be.</p>												
	<p><u>Section 5, paragraph 5.24: Mitigation Measures and Opportunities for Enhancement</u></p> <p>We would encourage you to use the assessment as a way to improve the environmental performance of individual aspects of the final option; hence we support proposals for enhancement of positive effects as well as mitigation of negative effects.</p> <p>It is useful to show the link between potential effects and proposed mitigation / enhancement measures in the assessment framework.</p> <p>We would encourage you to be very clear in the Environmental Report about mitigation measures which are proposed as a result of the assessment. These should follow the mitigation hierarchy (avoid, reduce, remedy or compensate).</p> <p>One of the most important ways to mitigate significant environmental effects identified through the assessment is to make changes to the plan itself so that significant effects are avoided. The Environmental Report should therefore identify any changes made to the plan as a result of the SEA.</p> <p>Where the mitigation proposed does not relate to modification to the plan itself then it would be extremely helpful to set out the proposed mitigation measures in a way that clearly identifies: (1) the measures required, (2) when they would be required and (3) who will be required to implement them. The inclusion of a summary table in the Environmental Report such as that presented below will help to track progress on mitigation through the monitoring process.</p> <table border="1" data-bbox="433 1572 1184 1768"> <thead> <tr> <th>Issue/Impact Identified in ER</th> <th>Mitigation Measure</th> <th>Lead Authority</th> <th>Proposed Timescale</th> </tr> </thead> <tbody> <tr> <td>Insert effect recorded in ER</td> <td>Insert mitigation measure to address effect</td> <td>Insert as appropriate</td> <td>Insert as appropriate</td> </tr> <tr> <td>Etc.</td> <td>Etc.</td> <td>Etc.</td> <td>Etc.</td> </tr> </tbody> </table>	Issue/Impact Identified in ER	Mitigation Measure	Lead Authority	Proposed Timescale	Insert effect recorded in ER	Insert mitigation measure to address effect	Insert as appropriate	Insert as appropriate	Etc.	Etc.	Etc.	Etc.	<p>Comments noted and welcomed.</p> <p>It is the intention of PKC to use the outcome of the assessment to enhance the PPS. A table of potential environmental effects identified through the assessment and suggested mitigation and/or enhancement measures will be included within the ER, including associated Appendices. This may include changes to the PPS which will be signposted within the ER for transparency/audit trail purposes.</p>
Issue/Impact Identified in ER	Mitigation Measure	Lead Authority	Proposed Timescale											
Insert effect recorded in ER	Insert mitigation measure to address effect	Insert as appropriate	Insert as appropriate											
Etc.	Etc.	Etc.	Etc.											
	<p><u>Section 5, paragraph 5.25: Monitoring Framework</u></p> <p>Although not specifically required at this stage, monitoring is a requirement of the Act and early consideration should be given to a monitoring approach particularly in the choice of indicators. We welcome the indicators chosen in Table 3.1. Please note our comments in Section 5 of this response for other indicators to be considered.</p>	<p>Comments noted and welcomed.</p> <p>Confirm that careful consideration has already been given by PKC to the indicators identified in Section 3 of the Scoping Report taking into account the scope of the assessment and supplementary guidance and also the data which PKC currently holds and</p>												

Consultee	Comments	Notes/PKC Response
		maintains along with any new trend data which it can obtain and update regularly, in order to allow for effective monitoring of the implementation of the SG. The Monitoring Framework for the SEA will be detailed in an Appendix to the ER.
Scottish Natural Heritage (SNH)	<p><u>Section 5, paragraphs 5.4 and 5.6: Scope and Level of Detail Proposed for the SEA</u></p> <p>We understand the format of the guidance is to:</p> <ul style="list-style-type: none"> i) provide a spatial framework for renewable energy developments ii) Set out guidance on environmental, social and economic considerations that need to be addressed for renewable proposals. <p>The scoping states that “the assessment method will focus on 2 scales, one of which will be at a river catchment scale to identify local level sensitivities, pressures and potential synergies and trade-offs.” It would be helpful to specify the river catchments and their extents in the scoping. The illustration of how the SEA topics are addressed under each ecosystem services is clear.</p>	<p>Comments noted and welcomed.</p> <p>The River Catchments are based on those within the Scottish River Basin Management Plan. A map of which has been appended to this analysis table for clarification purposes.</p>
	<p><u>Section 5, paragraphs 5.7, 5.11, 5.15 and Figure 5.2: Ecosystem Services Approach and Overall Approach to the Assessment</u></p> <p>We support the proposed approach of ecosystem services assessment as part of the SEA to inform the spatial framework and identification of issues for renewable energy developments, and the use of JHI’s recent research on the Regional Land Use Pilot projects. It is understood that the value of this approach will be to identify significant changes from renewable proposals on each service and assist in identifying the most sustainable actions (5.11), and which ecosystems services are most likely to be affected by different actions (5.15).</p> <p>We recognise that ecosystem services assessment is still in its early stages, and this assessment is reliant on sufficient information being available on the ecosystem services present within the catchment, the mapping of these and their extent and condition. The scoping report acknowledges that these may not be known (5.15). We suggest these data gaps are clarified in the ER, along with an explanation of how the assessment is able to proceed if this information is not available. We also recognise that there will be issues around the confidence that can be ascribed to the use of particular datasets to represent the potential or flow of ecosystem services. We would be pleased to discuss how these uncertainties can be addressed to enable the satisfactory assessment of significant environmental effects. If the assessment method is likely to differ from that currently proposed, we request that draft methodologies for these are forwarded for comment prior to the commencement of the process.</p> <p>Figure 5.2 provides a useful illustration of the proposed assessment approach incorporating ecosystems services into the SEA.</p>	<p>Comments noted and welcomed.</p> <p>Please note that it is not intended for the assessment to rely solely on ecosystem services but also the other considerations identified for each of the different technologies within SPP (2014) and other Scottish Government Policy & Guidance will be applied as an additional filter where required.</p>
	<p><u>Section 5, paragraphs 5.16-5.17: Thematic or Objective Based Assessment</u></p> <p>The scoping report states this is the first stage in the assessment, involving evaluation of the SG’s strategy actions against the SEA objectives. The summary table for the first part of the assessment (figure 5.3) is comprehensive and clear. We recommend a column is added for residual environmental effects post mitigation measures.</p> <p>Figure 5.4 sets out the proposed assessment classification and we are content with the thresholds provided. We welcome the intent to identify and report potential significant effects under SEA objectives. We recommend a fuller explanation of the nature and extent of these effects is provided here so as to provide a more transparent process. This should include uncertain and cumulative effects.</p>	<p>Comments noted and welcomed.</p> <p>‘Residual Effects’ column added to Table 6.5 (Mitigation Measures) of the Environment Report to allow for the consideration of any post mitigation measures residual effects and to assist in transparency of the decision-making process.</p> <p>Comments noted. Figure 5.4: Assessment Criteria of the Scoping Report does include an ‘Uncertain’ classification with grey as the matrix colour-code in the key. The description for this class is given as ‘The effect is not known, or is too unpredictable to assess. Further assessment may be made or required at the more detailed level of planning.’</p>
	<p><u>Section 5, paragraphs 5.19-5.22: Scenario Testing</u></p> <p>The scoping report proposes a decision support tool in order to assist in identifying preferred areas where the Council can support renewable/low carbon proposal and areas of sensitivity/constraint. This tool will allow stakeholders to weight priorities for the demands on the landscape from renewables. We recognise this is early stages and alternative objectives and policies have not been defined. We will be pleased to discuss this and the development of scenarios and weightings/strategies further with you prior to application of the tool for the SEA.</p>	<p>Comments noted and welcomed.</p> <p>The concept of ‘scenario testing’ was explored further as part of a stakeholder workshop held in November 2016 and the methodologies incorporated as part of the assessment process are detailed in Sections 4, 5 & 6 of the Environmental Report.</p>
	<p><u>Section 5, paragraph 5.23: Cumulative and Synergistic Effects</u></p> <p>We recognise the importance of the assessment of cumulative environmental effects of a combination of different types of renewable technology. We note expert judgement will be used to assess this and seek the inclusion of commentary to explain the rationale for this.</p> <p>We note it is intended to consider cumulative effects at the Council-wide level, as opposed to the catchment level proposed elsewhere. As the SG proposes to guide renewable development to appropriate locations, cumulative effects will need to be assessed separately from individual effects from renewable technologies to inform the spatial framework. Given this relationship, we suggest a catchment scale should be used for both.</p>	<p>Comments noted and welcomed.</p> <p>The methodology for the assessment of cumulative and synergistic effects is included under Sections 4, 5 & 6 of the Environmental Report. PKC would be happy to meet to discuss the methodology undertaken as part of the overall assessment.</p>
	<p><u>Section 5, paragraph 5.24: Mitigation Measures and Opportunities for Enhancement</u></p> <p>The proposed approach is welcomed. PAN 1/2010 (para 5.22) recommends that “it is useful to define each action, explain the reasons for them and identify responsible partners.” It also recommends timescales for mitigation and linking measures with monitoring. There should be a clear link in the ER between any adverse environmental effects identified and the mitigation/enhancement measures required, including changes.</p> <p>If significant environmental effects are predicted, mitigation measures could include a modification to the SG to help avoid significant adverse effects. We recommend residual effects post mitigation and enhancement should also be provided.</p>	<p>Comments noted and welcomed.</p> <p>As per comments provided above a column for reporting residual effects has been added to Table 6.5 Mitigation Measures.</p> <p>Furthermore, as per SEPA’s Scoping Report comments regarding the same section of the Report, PKC has incorporated the key points identified by SNH in respect of mitigation within the ER.</p> <p>Amendments to the SG proposed as mitigation and/or enhancement measures have been clearly reported/signposted in the ER.</p>

Consultee	Comments	Notes/PKC Response
	<u>Section 5, paragraph 5.25: Monitoring Framework</u> Monitoring is a requirement of the Act and we support the proposed approach. Please provide details of frequency of monitoring.	Comments noted. Monitoring frequency has been included in the Environmental Report Monitoring Framework (Appendix 6).
	<u>Section 5, paragraphs 5.27-5.29: Stage D – Consultation on the Guidance and Environmental Report</u> An ecosystem approach includes involving people in decision-making, as defined in the Scottish Biodiversity Strategy 2020 Challenge and the Land Use Strategy Information Notes, and the proposed stakeholder and public participation engagement is supported. Further details of how representative engagement can be achieved and how this will shape the SG would be welcomed.	Comments noted and welcomed. A participatory stakeholder workshop was held in November 2016 to explore the ‘Ecosystem Services’ methodology further and outputs of this workshop have been used to help shape development of the SEA and SG. This Consultation allows stakeholders to further consider the methodology and wider assessment/ SG.
	<u>Section 5, paragraphs 5.30-5.31: Stage E – Design and Communication</u> We welcome the intended clear and interactive approach. Presenting the assessment at a spatial catchment scale is supported in principle (5.22). However, this needs to be sufficiently detailed so that users can identify it as part of a recognisable place. We expressed concern about the spatial representation of the Council’s Green Infrastructure SG (July ’15) and strongly recommend mapping is on an O.S. base and at a local scale so that it can be used effectively for planning proposals.	Comments noted.
West Coast Energy Limited	It is our opinion that the concept of approaching the issue of renewable energy through river catchment areas one of the most confusing elements of this work. This is perhaps primarily because it is almost inevitable that a wind energy scheme is a very different form of development to most other developments in that it may well be located on the watersheds or interfluves such that it does not fit neatly into the boxes that are being set up. While hydro schemes would certainly lend themselves to catchment approaches, we doubt very much whether wind energy developments will. This is especially the case in the section on cumulative effects where it appears to be taking the approach of looking at cumulative effects within a catchment area – that is acceptable for developments affecting river flows and certain habitats issues but how can this possibly assist in assessing landscape and visual effects where those effects may arise across a whole range of different catchment areas. We just fail to see the logic for wind energy, which is after all the most important of the technologies, that a catchment approach can offer any real merits.	Comments noted. Perth and Kinross is an extensive area and it is necessary for both environmental assessment and reporting reasons to break it down into manageable areas, especially taking into account the sheer volume of environmental assets to be considered across the Council area. The river catchments have proved in previous SEA work undertaken by the Council to lend themselves well to the environmental assessment process. That being said the spatial strategy for renewable energy development proposals/areas identified as the most suitable for such proposals for different technologies to be included in the SG will not be confined to specific catchment areas but will look across Perth and Kinross as a whole.
SECTION 6: NEXT STEPS		
Historic Environment Scotland (HES)	<u>Section 6: Next Steps – Indicative Timetable</u> Section 6 indicates that there will be a consultation period of six weeks for the draft Environmental Report, and I am content with this timescale. Please note that, for administrative purposes, Historic Environment Scotland consider that the consultation period commences on receipt of the relevant documents by the SEA Gateway.	Comments noted and welcomed None
Scottish Environment Protection Agency (SEPA)	<u>Section 6: Next Steps – Indicative Timetable</u> It is not clear from the scoping report the specific time period proposed for consultation on the Environmental Report. This period should be agreed with the Consultation Authorities at the scoping stage. Accordingly, we would welcome further dialogue with you in order to agree an appropriate timeframe. Typical consultation periods range from 6-12 weeks depending on the content and nature of the plan. The consultation period must offer the Consultation Authorities and the public an early and effective opportunity to express their views and opinions.	Comments noted. Table 6.1: Key Remaining Steps in the SEA Process identifies a 6 week proposed consultation period for the SEA ER and draft Supplementary Guidance. The consultation will actually run for a period of xx weeks to allow further consideration of the SG and associated Environmental Assessment. PKC will advise the Scottish Ministers of the intended consultation period in accordance with Section 15(3) of the 2005 Act in due course.
Scottish Natural Heritage (SNH)	<u>Section 6: Next Steps – Indicative Timetable</u> We are content with the 6 week consultation period proposed for the Environmental Report in early 2016.	Comments noted and welcomed.
APPENDICES		
Scottish Environment Protection Agency (SEPA)	<u>Appendix A</u> We welcome the detailed description of Plans, Policies and Strategies (PPS) relevant for the SG included in Appendix A. We would however welcome reference under the SEA topic of Water, to the current River Basin Management Plans (RBMPs) and to the fact that new ones are going to be published in December 2015. Please see above our general comments in relation to the links to LDP2 consultation and the consideration of comments arising from that consultation and process. We note that Appendix A mentions the fact that a new Main Issues Report will be published soon and we welcome this. Some of the PPS included have themselves been subject to SEA. Where this is the case you may find it useful to prepare a summary of the key SEA findings that may be relevant to the SG. This may assist you with data sources and environmental baseline information and also ensure the current SEA picks up environmental issues or mitigation actions which may have been identified elsewhere. We welcome the reference to the SEA of the LDP1.	Comments noted and welcomed. Appendix 2 of the Environmental Report, which describes the Plans, Policies and Strategies (PPS) relevant for the SG has been updated to reflect SEPA’s comments.
Scottish Natural Heritage (SNH)	<u>Appendix A: Analysis of Other Relevant PPS</u> Relevant Plans, Programmes and Strategies (PPS) - Appendix A: We support the focusing on PPS which are particularly relevant to renewables and low carbon. The list of PPS is comprehensive and thorough.	Comments noted and welcomed.
	<u>Appendix B: Draft Environmental Baseline Maps and Data</u> The inclusion of SNH’s 2014 Carbon and priority peatland consultation map is welcomed. Strategic green networks map: we support the inclusion of a baseline on green networks. We refer to our comments on this map also made in our response to the	Comment noted and welcomed.

Consultee	Comments	Notes/PKC Response
	<p>recent Local Development Plan SEA scoping consultation: It is not possible to differentiate between the legend for some of the maps (e.g. green networks) and we recommend these are updated for the ER and use contrasting colours to enable the routes/legend to be shown. We recommend the inclusion of all of 'Scotland's Great Trails'; it is not clear from the map whether the Rob Roy Way is shown:</p> <p>http://www.snh.gov.uk/enjoying-the-outdoors/where-to-go/routes-to-explore/scotlands-great-trails/</p>	<p>Comments noted –Environmental Baseline has been updated.</p>

River Basin Catchment Map

